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17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN FRANCISCO DIVISION**

20 AMERICAN FEDERATION OF
21 GOVERNMENT EMPLOYEES, AFL-CIO, et
al.,

22 Plaintiffs,

23 v.

24 DONALD J. TRUMP, in his official capacity as
25 President of the United States, et al.,

26 Defendants.
27
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Case No.: 3:25-cv-03070-JD

**DECLARATION OF KATRISSE
NEWMAN**

DECLARATION OF KATRISSE NEWMAN

I, Katrise Newman, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.

2. I am a Health Technician / Medical Support Assistant in the Defense Health Agency (“DHA”), within the Department of Defense. I work at the Blanchfield Army Community Hospital in Fort Campbell, Kentucky. I have worked in this role since 2022. As a Health Technician/Medical Support Assistant, I check patients in and out for appointments, schedule appointments, handle referrals, and call patients.

3. I am the Secretary for the American Federation of Government Employees (“AFGE”) Defense Health Agency Council. I am also the Chair of the DHA Council for the AFGE Defense Conference (“DEFCON”). The Defense Health Agency Council is the exclusive representative (as delegated by AFGE) for approximately 38,000 federal civil servants who work for the DHA. DHA provides healthcare services for military members and their families. Workers represented by the DHA Council include doctors, nurses, emergency room staff, medical support assistants, laboratory staff, and other workers providing hospital services. I believe almost all of those workers are covered by the March 27, 2025 Executive Order titled “Exclusions from Federal Labor Management Relations Programs” (“Executive Order”).

4. I am also a member of and a union steward for AFGE Local 2022. Local 2022 represents a bargaining unit of approximately 2400 civil servants who work at Army bases and locations in Kentucky and Illinois, including Fort Knox, Kentucky, Fort Campbell, Kentucky, and Rock Island, Illinois. These employees include a variety of civil service jobs, including DHA healthcare workers, dental services workers (DENTAC), Child Youth Services workers, contractors, and many administrative workers. I believe most of those workers are covered by the Executive Order, with some exceptions, such as air traffic controllers and firefighters

5. DHA Council’s mission is to advocate for and promote the interests of military healthcare workers in their federal employment, including working for a safe and fair workplace

for all members. As the exclusive bargaining representative of these workers, DHA Council's purposes include to negotiate and enforce a national-level Master Labor Agreement ("MLA") with DHA, as well as to provide other support, guidance, and resources to healthcare workers and their AFGE affiliates. Local AFGE affiliates whose members include DHA workers may include local supplements to the MLA that address local issues.

6. Local 2022's mission is to advance the interests of its unit members working at Army bases and locations in Kentucky and Illinois area. Local 2022's services to workers include filing and negotiating grievances to enforce the terms and conditions of relevant collective bargaining agreements ("CBAs"); pursuing arbitrations on behalf of workers to enforce the CBAs; and providing other information and training to workers.

7. The Executive Order will have an immediate adverse effect on DHA Council's and Local 2022's abilities to provide these services to unit members and to accomplish their missions.

8. If the DHA Council and Local 2022 no longer represent workers under the Executive Order, then bargaining unit workers' CBAs effectively cannot be enforced against their agency employers. For instance, the DHA MLA, which was finalized the week of March 24, 2025, provides important rights and protections to workers. The MLA:

- a. Sets terms and conditions for working hours, overtime, sick leave, holidays, and paid time off for workers in the unit.
- b. Imposes safety and health requirements to ensure the welfare of workers in their place of employment.
- c. Establishes protections for workers regarding reduction-in-force ("RIF") actions and procedures.
- d. Imposes procedures for and limitations on disciplinary and adverse actions against workers.

- e. Provides for an Employee Assistance Program for individuals who have problems associated with alcohol, drug, marital, family, legal, financial, stress, attendance, and other personal concerns.
- f. Establishes grievance and arbitration procedures for employees and the Union to resolve disputes with the agency over employment matters.
- g. Provides for official time, which allows bargaining unit employees to perform union representation activities during certain amounts of time the employee otherwise would be in a duty status, without loss of pay or charge to annual leave.

Without a union to represent them and enforce the MLA, workers like will not have the benefit of those rights and protections going forward. I understand that DHA may also rescind the MLA, or take the position that it was never effective, under the Executive Order.

9. As a result of the Executive Order, pending grievances and arbitrations to vindicate workers' rights, including under the CBA, will be left unresolved.

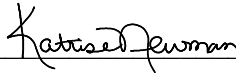
10. Local 2022's and DHA Council's staff and activities are funded through members' voluntary dues, which typically have been paid through payroll deduction. If the AFGE can no longer receive dues through payroll deduction under the Executive Order, that will make it more difficult for the unions to continue to provide the services and protection to unit members listed above.

11. As a union steward, my responsibilities include representing co-workers during disciplinary (*Weingarten*) meetings, dealing with management over workplace disputes or problems, handling grievances brought by unit members, and generally working to ensure rules and requirements are followed in the workplace and unit members have a chance to raise issues with their employer in a productive and collaborative way. I currently perform these duties, as reasonable and necessary, on official time. If, due to the Executive Order, I am no longer able to perform these activities on official time, then I will not be able to keep performing the same amount of duties and I would not be able to perform these duties as well as I do now. Bargaining

1 unit members will be deprived of these representation services that the union usually provides
2 them.

3 12. If the Executive Order remains in effect, it will continue to make bargaining unit
4 workers afraid to criticize the Administration, to take a political stance that opposes the
5 Administration, or raise workplace concerns with the Administration. I personally know workers
6 at my hospital who are now hesitant to bring issues to management because they are worried
7 they will be retaliated against by the government. If a Court stops the Executive Order, that will
8 help show workers that they can speak up without losing their collective bargaining rights.

9 I declare under penalty of perjury under the laws of the United States that the foregoing is
10 true and correct. Executed April 1, 2025, in Fort Campbell, Kentucky.

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